

Makarow, Irina (OCD)

From: Scott Ackerman [ack7777@valint.net]  
Sent: Friday, October 05, 2001 3:41 PM  
To: efsec@ep.cted.wa.gov  
Subject: Starbuck Power project

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October 5, 2001

OCT 05 2001

Allen Fiksdal, EFSEC Manager  
P.O. Box 43172  
Olympia, WA  
99504

**ENERGY FACILITY SITE  
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Allen Fiksdal,

Following are the concerns and questions which Blue Mountain Audubon Society (BMAS) would like EFSEC to consider with regard to the Starbuck Power Project. We are working from the green EFSEC and BPA information sheets received at the Wallula Power Project scoping meeting on October 2, 2001. Hard copies of the environmental documents for Starbuck Power Project were not available at Walla Walla Public Library as of this date.

BMAS is concerned about the incongruity of the amounts of water, 432,000 gal./day proposed for Starbuck with respect to the 11,000,000 gal./day proposed for the Wallula Power Plant. Given the close proximity in megawatts generated and similar design of these two plants, one would assume they would utilize similar amounts of water. Why this vast discrepancy in water usage?

BMAS feels Starbuck's proposed water from new, on-site wells is problematic. Given the amount of work and money spent with respect to maintaining water flows in the Snake and Columbia Rivers for endangered fish populations, we need to investigate areas which would net a zero loss of ground water recharge to the nearby Snake River.

Furthermore, wastewater discharge for Starbuck Energy Project to unlined ponds on the site is unacceptable. We would ask Starbuck Power Company, LLC to emulate the proposed Wallulla Power Facility wastewater treatment which includes clay and HDPE liners in their ponds with leakage detection devices and monitoring to insure the integrity of the system.

Finally, if Starbuck Power Company, LLC is to pay emission fees on a portion of its CO2 emissions, BMAS would like to be a part of the decision as to where these monies would be allocated. Our chapter envisions this money best spent to enhance the environment of Columbia County which we feel will be greatly degraded by this energy plant.

Thank you for your time and effort with this matter.

Sincerely,  
Diane Ackerman for  
Chris Howard, Conservation Chair  
Blue Mountain Audubon Society  
734 University  
Walla Walla, WA 99362

**Department of Ecology Eastern Regional Office's  
EIS Scoping Issues for the Starbuck Power Plant**  
(October 4, 2001)

**General:**

- Discuss the need for the power plant. Provide justification in light of the projected supply demand for the western U.S. Or, as an alternative, have up to date information on the supply-demand power situation for the West Coast.
- Describe the experience and track record of PPL Global in developing and operating power plants.
- Coordinate with agencies of jurisdiction to update the permits and approvals that will likely be needed for the project.
- Identify the additional permits and approvals that would be needed to construct the water line, if indeed the water line from the town of Starbuck is needed.
- Show a project timeline that would include when permits and approvals need to be in place for construction of the project to commence.

**Water Resources:** [Ecology wants to encourage all cost effective measures to conserve and reuse water]

- Address whether anything else can be done beyond what is proposed in the SC application to conserve and reuse water.
- Specifically discuss the uses for the additional 200 gpm of needed for water supply versus the 100 gpm mentioned in the Potential Site Study. Address whether there would be any adverse impacts to air emissions or wastewater discharge from use of the larger amount of water.
- Describe the aquifers, their depths and characteristics
- Evaluate the impacts of taking the agricultural land out of use

**Maintaining Air Quality:**

- Compare the projected emissions from this facility with at least a few other recently constructed power plants in the U.S. (Want some idea whether Washington is getting a "state of the art" facility in terms of the potential to pollute.)
- Quantify the proposed PM<sub>10</sub> & PM<sub>2.5</sub> emissions from this facility
- Identify and describe the control options and control measures to achieve PM<sub>10</sub> & PM<sub>2.5</sub> emission reduction.
- Describe and explain mitigation for PM<sub>10</sub> & PM<sub>2.5</sub> particulate
- Describe how BACT will be applied for the other criteria pollutants.
- Describe and quantify the effectiveness of the proposed emission controls
- Identify the potential Toxic Air Pollutants (TAPs) of concern. Describe the processes and any control strategy for TAPs
- Describe the potential to emit VOCs from this facility's operation
- Discuss the probable impacts on the dispersion of emissions that siting the facility in a valley presents. Address how the fact the plant will be sited in a valley was accounted during air modeling.
- Describe the potential cumulative impacts to air quality from the many proposed gas-fired turbine facilities in the Columbia County, Franklin County Walla Walla County and Hermiston, Oregon area.

**Maintaining Water Quality:**

- Describe the approximate flows for each waste category?
- Describe the design of the infiltration ponds.

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- Chemically characterize the wastewater effluent coming from the plant (compounds and concentration levels)
- Describe the projected impacts of total dissolved solids (TDS) to groundwater.
- Describe the secondary containment that is proposed for fuel tanks.
- Describe how will sanitary wastewater be handled during the construction phase.

**Wetlands:**

- Describe the location and classification of wetlands that would be impacted if the water supply line from Starbuck were needed.
- Identify where the water line route would go in relation to the 100-year flood plain.

**Department of Ecology Eastern Regional Office's  
EIS Scoping Issues for the Starbuck Power Transmission Line**

(October 4, 2001)

Note: An e-mail was forwarded to Phil Smith at BPA outlining the issues that we would like to see addressed. Below is a copy of that e-mail.

-----Original Message-----

**From:** Jayne, Douglas  
**Sent:** Wednesday, September 05, 2001 5:08 PM  
**To:** Phil Smith (E-mail)  
**Subject:** Some input on the proposed Starbuck Power line

**Hi Phil:** It was good to talk with you on 8/28 about the proposed Starbuck to Lower Monumental power line. We have a couple of initial comments to make on the power line project based on the brief description and map of the route that was forwarded to us.

1. We don't understand the need for a 1,200 foot spacing between the existing and the proposed lines. I appears that the spacing proposed will cause considerable more impact to the shrub-steppe ecosystem than, say a 300-400 foot spacing.
2. We would like to see route alternatives evaluated that would minimize impacts to the shrub-steppe ecosystem.
3. Where impacts to this ecosystem are necessary, we would like to see mitigation measures proposed and implemented to minimize impacts.
4. We are also concerned about potential impacts to migratory waterfowl and raptors in the vicinity of the power line.

We understand that along the proposed route there are no wetland, or shoreline jurisdictional issues associated with this project. This is except for the small wetland that you described that lies along the path of the power line, but which would not be directly impacted by its construction. The few streams that need to be crossed are small intermittent streams without any fish in them. We also understand that the primary issues of concern expressed thus far are potential impacts to Native American cultural sites.

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We look forward to reviewing the Draft EIS for the project that I understand will be out mid-fall. Thanks for the opportunity to provide input. Please keep me informed of any upcoming public or agency meetings on this proposed project. My mailing address is shown below. Thanks, -----Doug Jayne, Permit Assistance (509) 456-3162, e-mail: [djay461@ecy.wa.gov](mailto:djay461@ecy.wa.gov)

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Allen Fiksdal, EFSEC Manager  
EFSEC  
Olympia, Wa.

**SEPA/NEPA SCOPING COMMENTS: Starbuck Power Project**  
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The Pacific Northwest Regional Council of Carpenters supports an energy plan for America that calls for the construction of power plants throughout the nation. Recent power shortages and predicted increased electrical demand require construction of power plants in the Northwest. Advances in natural gas combustion engineering make Combined Cycle power plants an attractive environmental option. Caution is recommended in planning for the construction of these power plants.

The Environmental Impact Statement should include the socio-economic impacts of displacing local construction trades people when out of area contractors bring in construction workers from outside this area.

The Central Washington/Columbia Basin region is the economically significant unit/area on which to base the effects of labor displacement. Construction craftspeople that live in any part of this area are accustomed to traveling throughout the area to secure employment. This practice has been the history of the area since the local economy stabilized after WWII.

Starbuck Power Co., LLC, has committed to a local hiring policy which gives preference to residents of Columbia county and the surrounding counties, and then state residents. This policy is taken to apply to all employees equally, those employed in the construction workforce and the plant operations employees who will work at the plant when it is finished.

A local hiring policy is shown to contribute stability to the community in which the project is built and add continuity to progress of the project.

Kirk Deal  
Pacific Northwest Regional Council of Carpenters  
3456 Martin Wy. E.  
Olympia, Wa. 98507

Jerome Johnson  
Pacific Northwest Regional Council of Carpenters  
2819 W. Sylvester  
Pasco, Wa. 99301

kirkdeal2396@hotmail.com

Makarow, Irina (OCD)

**From:** Lavigne, Ronald (ATG) [RonaldL@ATG.WA.GOV]  
**Sent:** Friday, October 05, 2001 4:28 PM  
**To:** Makarow, Irina (OCD)  
**Subject:** SEPA scoping for Wallula and Starbuck proposals

Irina, there are two items that I would like EFSEC to analyze during SEPA for the above-referenced projects in addition to the items I mentioned during the agency meetings on Tuesday and Wednesday.

Wallula - I would like EFSEC to analyze the visual, aesthetic and functional impacts of the project on the McNary National Wildlife Refuge. The analysis should include a consideration of mitigation measures for any unavoidable impacts.

Starbuck - I would like EFSEC to analyze the visual, aesthetic and functional impacts of the project on the Lyons Ferry State Park as well as the impacts to recreational boaters on the Snake River. The analysis should include a consideration of mitigation measures for any unavoidable impacts.

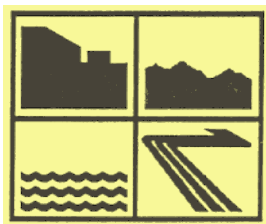
Thank you for your consideration of these matters.

Ronald L. Lavigne  
Counsel For the Environment

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## COMMENT FORM

### Proposed Starbuck Power Project

Public Information and NEPA/SEPA Scoping Meeting  
October 3, 2001 6:30 PM to 8:30 PM

Name: Jed Penner Date: \_\_\_\_\_  
Address: 431 Kellogg Road Dayton WA 99328  
E-mail: \_\_\_\_\_

**Which issues do you think are important for us to consider? What are your concerns? We are very interested in what you have to say.**

**Please write any comments or questions you have below:**

*I urge that some revenue that this project generates be spent in the local area in the form of maintenance contracts, public support, Ammonia supply contracts, police & fire support etc.*

*As a local farmer, I'd like information on the CO<sub>2</sub> emissions, credits & mitigation programs for the CO<sub>2</sub> gases*

*Use the back of this form or attach additional pages if you need more room*

Please place this form in the drop box, or mail or fax to:

Allen Fiksdal, EFSEC Manager  
PO Box 43172  
Olympia, WA 98504

Phone: (360) 956-2121 Fax: (360) 956-2158  
[efsec@ep.cted.wa.gov](mailto:efsec@ep.cted.wa.gov) [www.efsec.wa.gov](http://www.efsec.wa.gov)